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*Proposed Counsel for the Debtors and
Debtors-in-Possession*

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

GENESIS HEALTHCARE, INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 25-80185 (SGJ)
)
) (Joint Administration Requested)
) (Emergency Hearing Requested)
)

**AGENDA FOR HEARING ON FIRST DAY MOTIONS SCHEDULED FOR
JULY 11, 2025 AT 9:30 A.M. (PREVAILING CENTRAL TIME)**

The above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) hereby file their agenda for matters set for hearing on July 11, 2025 at 9:30 a.m. (prevailing Central Time) (the “First-Day Hearing”) before the Honorable Chief Judge Stacey G.C. Jernigan at the United States Bankruptcy Court for the Northern District of Texas, at Courtroom 1, 14th Floor,

¹ The last four digits of Genesis Healthcare, Inc.’s federal tax identification number are 4755. There are 299 Debtors in these chapter 11 cases, for which the Debtors have requested joint administration. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://dm.epiq11.com/Genesis>. The location of Genesis Healthcare, Inc.’s corporate headquarters and the Debtors’ service address is 101 East State Street, Kennett Square, PA 19348.

Earle Cabell Federal Building, 1100 Commerce Street, Dallas, Texas 75242-1496. The Debtors will ask the Court to consider the following matters:

I. MATTERS GOING FORWARD:

- A. Notice of Designation as Complex Chapter 11 Bankruptcy Case [Docket No. 2]

Related Documents:

- a. Declaration of Louis E. Robichaux IV in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 18]
- b. Notice of Hearing on First Day Motions [Docket No. 20]

Response Deadline: Prior to or at First-Day Hearing

Status: This matter is going forward.

- B. Debtors' Emergency Motion for Entry of Order (I) Directing Joint Administration of the Debtors' Chapter 11 Cases and (II) Granting Related Relief [Docket No. 3]

Related Documents:

- a. Declaration of Louis E. Robichaux IV in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 18]
- b. Notice of Hearing on First Day Motions [Docket No. 20]

Response Deadline: Prior to or at First-Day Hearing

Status: This matter is going forward.

- C. Debtors' Emergency Motion for Entry of Order (I) Authorizing the Debtors to (A) File (1) a Consolidated Creditor Matrix, (2) a Consolidated List of Their 30 Largest Unsecured Creditors, and (3) Two Consolidated Monthly Operating Reports, (B) Redact Certain Personally Identifiable Information for Individual Creditors, and (C) Implement Procedures to Protect Confidential Patient and Resident Information; (II) Establishing a Complex Service List; (III) Approving the Form and Manner of Notifying Creditors of Commencement of These Chapter 11 Cases; and (IV) Granting Related Relief [Docket No. 4]

Related Documents:

- a. Declaration of Louis E. Robichaux IV in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 18]
- b. Notice of Hearing on First Day Motions [Docket No. 20]

Response Deadline: Prior to or at First-Day Hearing

Status: This matter is going forward.

- D. Debtors' Emergency Application for Entry of Order Authorizing the Retention and Employment of Epiq Corporate Restructuring, LLC as Claims, Noticing, Solicitation, and Administrative Agent Effective as of the Petition Date [Docket No. 5]

Related Documents:

- a. Declaration of Louis E. Robichaux IV in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 18]
- b. Notice of Hearing on First Day Motions [Docket No. 20]

Response Deadline: Prior to or at First-Day Hearing

Status: This matter is going forward.

- E. Debtors' Emergency Motion for Entry of Order (I) Extending Time to File (A) Schedules of Assets and Liabilities and Statements of Financial Affairs and (B) 2015.3 Reports, and (II) Granting Related Relief [Docket No. 6]

Related Documents:

- a. Declaration of Louis E. Robichaux IV in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 18]
- b. Notice of Hearing on First Day Motions [Docket No. 20]

Response Deadline: Prior to or at First-Day Hearing

Status: This matter is going forward.

- F. Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Payment of Prepetition Obligations Owed to Resident Care Vendors and (II) Granting Related Relief [Docket No. 12]

Related Documents:

- a. Declaration of Louis E. Robichaux IV in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 18]
- b. Notice of Hearing on First Day Motions [Docket No. 20]

Response Deadline: Prior to or at First-Day Hearing

Status: This matter is going forward.

- G. Debtors' Emergency Motion for Entry of Order (I) Authorizing the Debtors to (A) Maintain, Administer, and Modify Their Refund Programs and Practices and (B) Honor Prepetition Obligations Related Thereto; and (II) Granting Related Relief [Docket No. 13]

Related Documents:

- a. Declaration of Louis E. Robichaux IV in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 18]
- b. Notice of Hearing on First Day Motions [Docket No. 20]

Response Deadline: Prior to or at First-Day Hearing

Status: This matter is going forward.

- H. Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Honor and Incur Obligations to Professional Corporations and (B) Obtain New Professional Corporations Contracts, (II) Extending the Automatic Stay to Certain Non-Debtors and (II) Granting Related Relief [Docket No. 14]

Related Documents:

- a. Declaration of Louis E. Robichaux IV in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 18]
- b. Notice of Hearing on First Day Motions [Docket No. 20]

Response Deadline: Prior to or at First-Day Hearing

Status: This matter is going forward.

- I. Debtors' Motion for Entry of Order (I) Authorizing the Debtors to (A) Reject Certain Unexpired Real Property Leases and (B) Abandon Certain Personal Property, Effective as of the Petition Date, and (II) Granting Related Relief [Docket No. 16]

Related Documents:

- a. Declaration of Louis E. Robichaux IV in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 18]
- b. Notice of Hearing on First Day Motions [Docket No. 20]

Response Deadline: Prior to or at First-Day Hearing

Status: The Debtors do not intend to seek entry of an order with respect to this motion at the First-Day Hearing and will notice this motion for hearing on August 5, 2025 at 9:30 a.m. CT. However, the Debtors intend to provide an overview of

the Debtors' potential facility divestitures and lease rejections at the First-Day Hearing.

- J. Debtors' Emergency Motion for Entry of Order Authorizing Debtors to (I) Maintain Existing Insurance Policies, Surety Bonds, and Letters of Credit and Pay All Obligations Arising Thereunder; (II) Renew, Revise, Extend, Supplement, Change, or Enter Into New Insurance Policies, Surety Bonds, and Letters of Credit; and (III) Granting Related Relief [Docket No. 7]

Related Documents:

- a. Declaration of Louis E. Robichaux IV in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 18]
- b. Notice of Hearing on First Day Motions [Docket No. 20]

Response Deadline: Prior to or at First-Day Hearing

Status: This matter is going forward.

- K. Debtors' Emergency Motion for Entry of Order (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment; (II) Establishing Procedures for Resolving Objections by Utility Providers; (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service; and (IV) Granting Related Relief [Docket No. 8]

Related Documents:

- a. Declaration of Louis E. Robichaux IV in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 18]
- b. Notice of Hearing on First Day Motions [Docket No. 20]

Response Deadline: Prior to or at First-Day Hearing

Status: This matter is going forward.

- L. Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Taxes, Fees, and Related Obligations and (II) Granting Related Relief [Docket No. 9]

Related Documents:

- a. Declaration of Louis E. Robichaux IV in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 18]
- b. Notice of Hearing on First Day Motions [Docket No. 20]

Response Deadline: Prior to or at First-Day Hearing

Status: This matter is going forward.

- M. Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Pay Prepetition Wages, Compensation, and Employee Benefits and (B) Continue Certain Employee Benefit Programs in the Ordinary Course, and (II) Granting Related Relief [Docket No. 10]

Related Documents:

- a. Declaration of Louis E. Robichaux IV in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 18]
- b. Notice of Hearing on First Day Motions [Docket No. 20]

Response Deadline: Prior to or at First-Day Hearing

Status: This matter is going forward.

- N. Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Existing Cash Management System, (B) Maintain Existing Bank Accounts and Business Forms and Honor Certain Prepetition Obligations Related to the Use Thereof, (C) Maintain Purchasing Card Programs and Honor Prepetition Obligations Related Thereto, and (D) Continue to Perform Intercompany Transactions; (II) Extending the Time for the Debtors to Comply with 11 U.S.C. § 345(b) Deposit and Investment Requirements; and (III) Granting Related Relief [Docket No. 11]

Related Documents:

- a. Declaration of Louis E. Robichaux IV in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 18]
- b. Notice of Hearing on First Day Motions [Docket No. 20]

Response Deadline: Prior to or at First-Day Hearing

Status: This matter is going forward.

- O. Debtors' Emergency Motion for Entry of Order (I) Restating and Enforcing the Automatic Stay, (II) Approving the Form and Manner of Notice, and (III) Granting Related Relief [Docket No. 15]

Related Documents:

- a. Declaration of Louis E. Robichaux IV in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 18]
- b. Notice of Hearing on First Day Motions [Docket No. 20]

Response Deadline: Prior to or at First-Day Hearing

Status: This matter is going forward.

- P. Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 17]

Related Documents:

- a. Declaration of Louis E. Robichaux IV in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 18]
- b. Declaration of Jaspinder Kanwal in Support of Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 19]
- c. Notice of Hearing on First Day Motions [Docket No. 20]

Response Deadline: Prior to or at First-Day Hearing

Status: This matter is going forward.

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Dated: July 10, 2025
Dallas, Texas

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CERTIFICATE OF SERVICE

I hereby certify that on this date a true and correct copy of the foregoing was served by the Court's CM/ECF system on all counsel of record registered in these Chapter 11 Cases through CM/ECF. Subject to the Court's approval of their retention and access to filing privileges, the Debtors' proposed claims and noticing agent will be filing a supplemental certificate of service on the docket to reflect any additional service of the foregoing.

Dated: July 10, 2025
Dallas, Texas

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